

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

RONNIE JONES, RICHARD
BECKERS, WALTER R.
WASHINGTON, WILLIAM E.
BRIDGEFORTH, SHAWN N. HARRIS,
EUGENE WADE, GEORGE C
DOWNING, JR., CLARARISE
BRISTOW, and the MASSACHUSETTS
ASSOCIATION OF MINORITY LAW
ENFORCEMENT OFFICERS,

Plaintiffs,

vs.

CITY OF BOSTON, BOSTON
POLICE DEPARTMENT, and
KATHLEEN O'TOOLE, as she is
Commissioner of the Boston Police
Department,

Defendants.

NO. 05-11832-GAO

**ASSENTED-TO MOTION TO EXTEND THE TIME FOR FILING PLAINTIFFS'
RESPONSE TO MOTIONS TO DISMISS THE BOSTON POLICE DEPARTMENT AND
COMMISSIONER KATHLEEN O'TOOLE AS DEFENDANTS**

Plaintiffs, with the assent of the defendants, hereby move for an order extending the time within which they may file a response to the defendants' motions to dismiss the Boston Police Department and Commissioner Kathleen O'Toole as defendants (the "Motions"), up to and including November 4, 2005, as agreed to by defendants' counsel. As grounds for this assented-to motion, plaintiffs state as follows:

1. The Motions (along with the answer of defendant City of Boston) were filed October 7, 2005. Accordingly, responses are due on October 21, 2005.

2. As a result of scheduling difficulties, the undersigned counsel requests additional

time to file a response to the Motions.

3. Pursuant to Local Rule 7.1, counsel have conferred regarding the instant motion and defendants' counsel assent to the relief requested herein.

4. This case was removed from state court and is just getting underway. A grant of this motion will not delay any proceedings or harm any of the defendants.

5. As a grant of this motion lies within the sound discretion of the Court, no memorandum of law is necessary.

WHEREFORE, plaintiffs respectfully request that the Court:

(1) ALLOW this Assented-To Motion for Extension of Time for Filing Plaintiffs' Response to Motions to Dismiss the Boston Police Department and Commissioner Kathleen O'Toole as Defendants;

(2) enter an Order extending, up to and including November 4, 2005, the deadline for plaintiffs to file a response to the Motions; and

(3) award any such other and further relief as the Court deems just and proper.

Respectfully submitted,

Ronnie Jones, Richard Beckers, Walter Washington, William Earl Bridgeforth, Shawn N. Harris, Eugene Wade George C. Downing, Jr., Clararise Bristow, and the Massachusetts Association of Minority Law Enforcement Officers,

By their attorneys,

/s/ Nadine Cohen

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Dated: October 19, 2005